

# **EXHIBIT 16**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,  
a foreign corporation,

Plaintiff,

vs.

Case No. 11-cv-12422-AC-MKM  
Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,  
MONICA LYNNE LUPILOFF, NICOLE RENEE  
LUPILOFF and NICOLE RENEE LUPILOFF,  
PERSONAL REPRESENTATIVE OF THE ESTATE  
OF GARY LUPILOFF, DECEASED,

Defendants.

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Michael F. Schmidt P25213  
Attorneys for Plaintiff  
1050 Wilshire Drive, Suite 320  
Troy, MI 48084  
(248)649-7800

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Albert L. Holtz P15088  
Attorney for Monica Lupiloff, Nicole Lupiloff  
and Nicole Lupiloff, Per Rep of the Estate of  
Gary Lupiloff, Deceased  
3910 Telegraph Road, Suite 200  
Bloomfield Hills, MI 48302  
(248)593-5000

John H. Bredell P36577  
Attorney for William & Jennifer Keene  
119 N. Huron Street  
Ypsilanti, MI 48197  
(734)482-5000

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**DEFENDANTS WILLIAM KEENE AND JENNIFER KEENE'S SUPPLEMENTAL  
ANSWERS TO INTERROGATORIES AND REQUESTS TO PRODUCE FROM  
PLAINTIFF NATIONWIDE LIFE INSURANCE COMPANY  
AND  
DEFENDANTS WILLIAM KEENE'S AND JENNIFER KEENE'S RESPOSE TO  
ORDER COMPELLING DEFENDANTS, WILLIAM KEENE AND JENNIFER KEENE,  
TO ANSWER DISCOVERY REQUESTS FROM  
PLAINTIFF NATIONWIDE LIFE INSURANCE COMPANY**

NOW COME the Defendants, **WILLIAM KEENE and JENNIFER KEENE**, by and through their attorneys, **BREDELL and BREDELL**, and submits the following Supplemental Answers to Interrogatories and Requests to Produce and response to the Order Compelling Defendants William Keene and Jennifer Keene to Answer Discovery Requests from Plaintiff:

1. (Response to Interrogatory #3) See copy of \$2,500.00 dishonored check attached hereto (Attachment A) and submitted previously.
2. (Response to Interrogatory #6) See attached Life Billing Statements and correspondence to Mr. Keene from Nationwide (Attachment B).
3. (Response to Interrogatory #9d) See all telephone records attached hereto for 248-767-6413, 734-377-8661 and 734-332-7855 (Attachment C).

4. (Response to Interrogatory #14)

See attached statements from (Attachment D):  
Mary Columbo  
Bethany Polanski - nanny at 2717 Ardmore  
Ryan and Rolondo – Construction Workers  
Sue Anne Smith – next door neighbor to Mr. Keene

5. (Response to Interrogatory #15) Please provide the following information:
  - a. Your full name;
  - b. Any other names you have ever been known by;
  - c. Your date of birth;
  - d. Your social security number;
  - e. Your present address;
  - f. Your addresses for five years preceding 2010;
  - g. Provide a detailed education of background, including any and all schools attended, dates of attendance and degrees, diplomas or certificates received;
  - h. For each employer you have had for the last ten years, provide the name and

- address of the employers; the inclusive dates worked, the position held, the name of the supervisor and the total income for each year of employment;
- i. Whether you have been involved in any other litigation, and if so, provide the caption of the suit, the court the suit was filed in, the name of your attorneys, and the nature of the claim;
  - j. If you have made any claims to any insurance company at any time, please state the name of the insurer, a description of the claim, the date of the claim, and the result of the claim;
  - k. If you have been arrested or convicted of a crime, please state the date and place of the crime, the charges made, the court in which the matter was pending, the ultimate result or disposition of the action.

ANSWER:

- a. William Frazer Keene
- b. None
- c. [REDACTED] 1966 - William Keene; [REDACTED] 1968 - Jennifer Keene
- d. [REDACTED] 1906 - William Keene; [REDACTED] 3030 - Jennifer Keene
- e. 2704 Brockman, Ann Arbor, MI 48104
- f. 2704 Brockman, Ann Arbor, MI 48104
- g. Southfield Lathrup High School, graduated 1984, Diploma  
Michigan State University, graduated 1989, Degree BS Pre-Medicine  
University of Michigan, 1987
- h. 2000- 2005 - Real Estate One, Farmington Hills, MI, Realtor, Manager: Steve Leiban  
2006-2010 - Remax Classic, Farmington Hills, MI, Realtor, Manager: Carol Boji  
See attached tax returns for the years 2005 through 2010 (Attachment E). Plaintiff no longer has tax returns for prior to 2005.
- i. Oakland County Circuit Court, civil suit, 2008; Case No. 08-094621-CK, Plaintiff sued Roger Avie, Judith A. Avie, Acton Investment Ltd, Vi-Spec, Inc. and Pipe Liners, LLC, for stolen funds and settled out of court for \$25,000. Plaintiff was represented by Madison Crest Business Law, PLLC, Attorney Margaret Kurtzweil; Defendant were represented by Larry T. Dressell.
- j. Homeowners claim, 1988, waters damage, received \$5,000
- k. No. N/A.

17. Please provide the following information:
  - a. list any and all investments from 1998 through 2010.
  - b. list any accounts, investments, etc. that were closed or placed into collection from 1998 through 2010.
  - c. identify any realtors used from 1998 through 2010.
  - d. identify any accountants used from 1998 through 2010.
  - e. provide all monthly statements or other such documents for all financial accounts, including, but not limited to, savings accounts, checking accounts, money market accounts, 401(k) accounts, IRAs, stocks, investment accounts, etc. for 1998 through 2010.
  - f. provide copies of all debt documents including, but not limited to, personal loans, land contracts, promissory notes, mortgages, bank loans, business loans credit cards, credit accounts, lines of credit, etc. for 1998 through 2010.
  - g. provide all federal, state, and local tax records for 1998 through 2010.

ANSWER:

- a. 60055 9 Mile Rd., South Lyon, MI.  
3983 Courville, Detroit, MI  
4969 Oak Hollow, West Bloomfield, MI.  
4396 Rolling Pine Dr., West Bloomfield Twp., MI  
2704 Brockman, Ann Arbor, MI (Jennifer Keene owner).  
(See attachment F-multi-list printouts for above properties).  
Fidelity Statement – all sold in 2008. (See attachment G).
- b. See attached TransUnion Credit Report. (See Attachment H.)  
Mr. Keene had a rental property that was his principal residence between 2004 and 2005. Mr. Keene put the home up for sale, he stopped paying his Chase mortgage, his PNC/National City Home Equity payment, and PNC/National City credit card hoping to motivate the bank to accept a short sale. Due to the short sale, not going through, the rental home went into foreclosure. The home was originally purchased for approximately \$530,000 and was sold for approximately \$300,000. Prior to the foreclosure, Mr. Keene's credit was exemplary, after foreclosure with the interest rates on his current credit cards ballooning to 24.9%, Mr. Keene closed and settled the majority of his accounts.
- c. See attachment F – multi-list printouts for properties bought and sold.
- d. See attached tax returns, Gerald M. Hoffman, Hoffmans Accounting and Tax Svc, 28497 Newport, Farmington Hills, MI 48331

- e. See all financial statements for the period 2005 through 2010 attached by each year. (See Attachment E.)
- f. See all documentation regarding debts for the period 2005 through 2010 attached by each year. See Attachment E.)
- g. See attached tax returns for the years 2005 through 2010 (Attachment E). Plaintiff no longer has tax returns for prior to 2005.

19. Please provide the following information:

- a. list any person, business, organization, bank, mortgage company, etc. that you owed money or any other form of debt from 1998 to 2010;
- b. list whether that debt was current in 2010;
- c. list whether any payments were missed on that debt from 1998 to 2010.

ANSWER:

- a-c. See attachment H, TransUnion Credit Report.

20. Please provide the following information:

- a. Any and all cell phone numbers and cell phone providers you used for any cell phones you used in July, 2010.
- b. List any and all home phone numbers and home phone providers you had in July, 2010.
- c. Please provide copies of all phone bills with call lists for July, 2010 for any and all cell phones or home phones.

ANSWER:

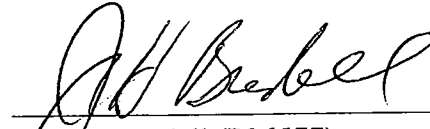
- a. 248-767-6413 and 734--377-8661 – Provider AT&T
- b. 734-332-7855 – Comcast
- c. See attached records all three. (See Attachment C.)

Signature page:

**DEFENDANTS WILLIAM KEENE AND JENNIFER KEENE'S SUPPLEMENTAL  
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PLAINTIFF NATIONWIDE LIFE INSURANCE COMPANY**

Respectfully submitted,

Dated: MARCH 12, 2012

  
\_\_\_\_\_  
John H. Bredell (P36577)  
Lynn Marie Bredell (P36778)  
Attorney for Plaintiff

Signed: \_\_\_\_\_  
William Keene

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on

MARCH 21, 2012, by U. S. mail.

Signature: Gail A. Stephens  
Gail A. Stephens

**NATIONWIDE LIFE INSURANCE COMPANY vs. WILLIAM KEENE**

**ATTACHMENTS TO:**

**DEFENDANTS WILLIAM KEENE AND JENNIFER KEENE'S SUPPLEMENTAL  
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**ATTACHMENT A**

Copy of \$2,500.00 Dishonored Check

**ATTACHMENT B**

Life Billing Statements and correspondence to Mr. Keene from Nationwide

**ATTACHMENT C**

All phone records for:

248-767-6413

734-377-8661

734-332-7855

**ATTACHMENT D**

Statements from:

Mary Columbo

Bethany Polanski

Ryan and Rolondo (Construction workers)

Sue Anne Smith

**ATTACHMENT E**

Tax Returns, Financial Statements, Credit Card, Mortgage Statements  
by individual years 2005 through 2010

**ATTACHMENT F**

Multi-list Printouts of property/investments

**ATTACHMENT G**

Fidelity Statement of investments

**ATTACHMENT H**

TransUnion Credit Report